

P-05-715 A Ban on the Manufacture, Sale and Use of Snares in Wales.

Correspondence – Petitioner to the Committee. 20.09.2016

Response to letter from the Cabinet Secretary for the Environment and Rural Affairs

- The letter from the Cabinet Secretary states that snares are used in Wales mainly to control foxes. Although that may be the intention, snares are indiscriminate and there is simply no way of knowing what species will be caught by any given snare. According to Defra figures¹, up to two thirds of those animals caught by snares are not the target species.
- Animals caught in snares include domestic pets such as cats and dogs. They may also include species that are protected in Wales, such as the badger, the pine marten or the otter. The Government should not authorise the use of a wildlife control method when it cannot be guaranteed that members of a protected species will not be killed by said method. The indiscriminate nature of snares means it is not possible to guarantee this with their use.
- Neither improving the Code of Practice nor ensuring 100 per cent compliance with it will prevent non-target species being caught in snares. There is no way of knowing or guaranteeing what species will be caught by any given snare.

¹ Defra (2012) Determining the extent of use and humaneness of snares in England and Wales.
<http://tinyurl.com/bmkqbpk>

- A snare that is compliant with the Code of Best Practice can still cause injury or death to the animal it catches. It is not possible to regulate snares effectively because they are by nature indiscriminate and inhumane.
- Finally, compliance with the Code is entirely voluntary, and there are no checks in place to ensure that operators comply, or penalties for those who do not.

Response to letter from the Countryside Alliance

- The Countryside Alliance is incorrect in saying that the League misrepresented statistics from the 2012 DEFRA report² by taking the capture rates from the single operator who carried out the humaneness testing work.
- In fact the capture rate we used was calculated from the data of two different field studies run by DEFRA (the only ones mentioned in their report) in which, combined, 62 foxes were caught in 1,915 snare days, a capture rate of one animal in every 31 snare days.
- The numbers produced come from the only available data provided by DEFRA, and when we have discussed the figures shown in our literature

² Defra (2012) Determining the extent of use and humaneness of snares in England and Wales.
<http://tinyurl.com/bmkqbpk>

with DEFRA officials they have never suggested to us that we have misinterpreted them.

- The Countryside Alliance is also incorrect in their points about our comments on the humaneness of snares. Firstly, when we stated that “even a Code-compliant snare is a crude, indiscriminate device, more likely to cause injury or death than to restrain an animal”, we did not mean that the new Code-compliant snares are more likely to cause injury or death than the old ones, as the Countryside Alliance infers with its incomplete quoting.
- What we are saying is that the new snares – although they may have reduced the chances of causing suffering to the animals caught compared with the old snares – still cause too much suffering, so we dispute the notion that the modern snares are a humane method for catching animals.
- Secondly, when the Countryside Alliance use the term “significant” to describe snare related injuries, it uses an old-fashioned approach on what constitutes significant injury.
- We base our comments on a modern approach of what actually constitutes unacceptable suffering. We argue that the indicators of welfare included in the 1998 Agreement on International Humane Trapping Standards (which is the benchmark against which the DEFRA

report evaluated the humaneness of the use of snares) are limited in scope and number, and would need to be updated to be able to detect all suffering involved. Although it is clear that the indicators included in these standards do indicate poor welfare, they could be argued to be associated with suffering at the extreme end of the sliding scale of animal welfare.

- Physical injuries not on their list of indicators, for example penetrating or slicing tissue wounds, claw loss and muscular, ligament and tendon damage short of severance, are now widely recognised by the veterinary profession as resulting in pain requiring treatment in domestic animals. The two behavioural indicators of poor welfare in the list only represent extreme cases; many other behavioural indicators of poor welfare have been used in studies of domestic animal welfare, for example vocalisation and attempts to escape from unpleasant environments.
- Modern animal welfare science has progressed far beyond the assessment of animal welfare solely on extremes of behaviour and physical injury. The World Organisation for Animal Health (OIE) recognises this, stating that ‘the scientific assessment of animal welfare has progressed rapidly in recent years’, and that this progress underpins the recommendations on animal welfare in the OIE Terrestrial Animal Health Code³. The OIE state that measures of animal welfare include assessment of affective (emotional) states of animals such as hunger, pain and fear.

³ Terrestrial Animal Health Code, Chapter 7.1, http://web.oie.int/eng/normes/mcode/en_chapitre_1.7.1.htm